## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

United States of America,

22-CR-00350-ALC

Plaintiff

v.

Joshua Streit,

Defendant,

## **Defendant's Unopposed Motion to Change His Surrender Date**

Defendant Joshua Streit moves this Court to change his surrender date from July 17, 2023, to October 23, 2023 so he can attend a medical specialist evaluation that he could not get scheduled earlier due to demand for the specialist. The Government does not object to this request but has advised that it will object to any further requests for extensions of the surrender date. Mr. Streit has made no prior requests for a change in his surrender date.

On February 21, 2023, Mr. Streit had a medical consultation that recommended further follow up with a referred specialist. The medical consultation is related to his medical condition as disclosed in his Presentence Report.<sup>1</sup> Mr. Streit immediately did so but given demand for the specialist the earliest appointment available was October 16, 2023.

<sup>&</sup>lt;sup>1</sup> Dkt. 22, at ¶ 88.

On March 21, 2023, this Court sentenced Mr. Streit to 36 months' imprisonment, and ordered that he surrender to the Bureau of Prisons no later than 10:00am on July 17, 2023.<sup>2</sup> The October 16, 2023, evaluation is diagnostic, and critical to Mr. Streit's health during his incarceration should it result in him requiring treatment during his incarceration.

## Conclusion

Therefore, Defendant Joshua Streit respectfully requests this Court change his surrender date from July 17, 2023 to October 23, 2023.

Dated: June 30, 2023 Brooklyn, New York

Respectfully submitted,

s/ Tor Ekeland

Tor Ekeland (SDNY TE5608)
Tor Ekeland Law, PLLC
30 Wall Street, 8th Floor
New York, NY
10005
t: (718) 737 - 7264
f: (718) 504 - 5417
tor@torekeland.com

Counsel for Defendant Joshua Streit

\_\_\_\_

<sup>&</sup>lt;sup>2</sup> Dkt. 32.

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 28th day of June 2023, the forgoing document was filed with the Clerk of Court using the CM/ECF System and delivered electronically through that system to the following Government attorneys.

s/ Tor Ekeland

Dina McCleod United States Attorney's Office One Saint Andrew's Plaza New York, NY 10007

dina.mcleod@usdoj.gov